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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Kelly Radkowski,

15 Plaintiff,

16 v.

17 Equifax Information Services LLC;
18 Experian Information Solutions, Inc.;
19 Clarity Services, Inc.; American
20 Express, Inc. and Clark County Credit
21 Union,

22 Defendants.

23 Case No.: 2:24-cv-02283

24 **Discovery Plan and Scheduling**
25 **Order Submitted in Compliance**
26 **with LR 26-1(b)**

1 On January 7, 2025, Clark County Credit Union appeared in this case and the
2 Court set a deadline to file a proposed discovery plan and scheduling order by
3 February 21, 2025. Accordingly, Kelly Radkowski and Clark County Credit Union
4 (collectively as the “Parties”), by and through their respective counsel, hereby
5 submit this Joint Discovery Plan and Scheduling Order. The parties will require 180
6 days of discovery measured from the date that Clark County Credit Union, filed its
7 answer to Plaintiff's complaint.

10 **DISCOVERY PLAN**

11 The parties propose the following discovery plan and scheduling order:

12 1. Initial disclosures March 10, 2025
13 2. Amend pleadings and add parties .. April 7, 2025
14 3. Expert disclosures (initial): May 7, 2025
15 4. Expert disclosures (rebuttal): June 6, 2025
16 5. Discovery cutoff date: July 7, 2025
17 6. Dispositive motions: August 5, 2025
7. Pretrial order September 4, 2025

18 In the event that dispositive motions are filed, the date for filing the joint
19 pretrial order shall be suspended until **30 days after** decision on the dispositive
20 motions or until further order of the court.

22 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
23 objections thereto, shall be included in the joint pretrial order.

1 Extensions or Modifications of the Discovery Plan and Scheduling Order:

2 Applications to extend any date set by the discovery plan, scheduling order, or other
3 order must comply with the Local Rules.

4

5 Protective Order: The parties may seek to enter a stipulated protective order
6 pursuant to Rule 26(c) prior to producing any confidential documents.

7

8 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
9 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
10 served by sending such documents by email.

11

12 Alternative Dispute Resolution Certification: The parties certify that they met
13 and conferred about the possibility of using alternative dispute-resolution processes
14 including mediation, arbitration, and early neutral evaluation. The parties have not
15 reached any stipulations at this stage.

16

17 Alternative Forms of Case Disposition Certification: The parties certify that
18 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
19 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
20

21 The parties have not reached any stipulations at this stage.

22

23 Electronically Stored Information: The parties have discussed the retention
24 and production of electronic data. The parties agree that service of discovery by
25 electronic means, including sending original electronic files by email or on a cd is
26 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

1 Electronic evidence conference certification: The parties further intend to
2 present evidence in electronic format to jurors for the purposes of jury deliberations
3 at trial. The parties discussed the presentation of evidence for juror deliberations but
4 did not reach any stipulations as to the method as this early stage.
5

6 Dated: February 21, 2025.
7

8 **FREEDOM LAW FIRM**

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15 **THE BALL LAW GROUP**

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 2-24-25